.)

Facsimile: (702) 383-0065

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

1

2

3

4

5

6

7

8

9

ANDRE M. LAGOMARSINO, ESQ. (#6711
TAYLOR N. JORGENSEN, ESQ. (#16259)
CRISTINA A. PHIPPS, ESQ. (#16440)
3005 West Horizon Ridge Pkwy., Suite 241
Henderson, Nevada 89052
Telephone: (702) 383-2864
Facsimile: (702) 383-0065
aml@lagomarsinolaw.com
taylor@lagomarsinolaw.com
cristina@lagomarsinolaw.com
JULIE RAYE, ESQ. (#10967)
8350 W. Sahara Ave., Suite 110
Las Vegas, Nevada 89117
Telephone: (702) 478-7600
Facsimile: (702) 366-1653
julie@thegracelawfirm.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

JESSICA COLEMAN, an individual; ALEISHA GOODWIN, an individual; NORAINE PAGDANGANAN, an individual; and RITA REID, an individual;

Plaintiffs,

VS.

ROBERT Telles, an individual; and CLARK COUNTY, a political subdivision of the State of Nevada;

CASE NO: 2:24-CV-00930-APG-MDC

PLAINTIFFS' AND DEFENDANT
CLARK COUNTY'S JOINT MOTION
TO EXTEND DEADLINE OF
PLAINTIFF'S OPPOSITION TO
DEFENDANT CLARK COUNTY'S
MOTION TO DISMISS (ECF. NO 17)

(First Request)

Defendant.

Plaintiffs JESSICA COLEMAN, ALEISHA GOODWIN, NORAINE PAGDANGANAN and RITA REID ("Plaintiffs"), and Defendant CLARK COUNTY ("CLARK COUNTY"), by and through undersigned counsel, hereby stipulate and jointly request an Order extending the deadline for Plaintiffs to file their Opposition to Clark County's Motion to Dismiss (ECF. No 17).

Pursuant to LR IA 6-1, the parties, by and through their respective counsels of record,

1

2

3

4

5

6

7

8

9

11

12

13

16

17

18

19

20

21

22

23

24

25

26

27

hereby request that this Court extend the deadline for Plaintiffs to file their opposition to Defendant Clark County's Partial Motion to Dismiss Plaintiffs' Complaint (ECF No. 17) in the abovecaptioned case two (2) weeks, up to and including July 24, 2024.

This joint request for an extension of time is not sought for any improper purpose of other purpose of delay and is Plaintiffs' first request for an extension to file this document. This request is filed as a joint request due to Plaintiffs' inability to reach Defendant TELLES for approval. This request for an extension is based upon the following:

Plaintiffs' firm is currently in the midst of preparing for a two-week trial in the Eighth Judicial District Court, set to start on August 19, 2024. Plaintiffs' firm's deadline to file both any motions in limine as well as any motions for summary judgment in said case was Friday, June 28, 2024, and the associated deadlines to file oppositions and replies are soon following. Additionally, Plaintiff's firm is currently missing one (1) of its four (4) attorneys, as a result of paternity leave, and a law clerk as a result of bar exam study. Cases and workloads have been re-allocated, and Plaintiffs' firm requires extensions of deadlines in certain areas.

This request for an extension is made in good faith and the parties respectfully request that this Court extend the time to file Plaintiffs' opposition to Defendant Clark County's Partial Motion to Dismiss Plaintiffs' Complaint (ECF No. 17) in the above-captioned case two (2) weeks, up to and including July 24, 2024.

DATED this 3rd day of July, 2024.

DATED this 3rd day of July, 2024.

LAGOMARSINO LAW

<u>/s/ Taylor N. Jorgensen</u> ANDRE M. LAGOMARSINO, ESQ. (#6711) TAYLOR N. JORGENSEN, ESQ. (#16259) 3005 W. Horizon Ridge Pkwy., #241 Henderson, Nevada 89052 Attorneys for Plaintiffs

MARQUIS AURBACH

/s/ Nick D. Crosby NICK D. CROSBY (#8996) TABETHA J. STEINBERG (#16756) 10001 Park Run Drive Las Vegas, Nevada 89145 Attorneys for Defendant Clark County

IT IS SO ORDERED:

July 8, 2024 Dated:

> ANDREW P. GORDON Page 2 of 2 UNITED STATES DISTRICT JUDGE